

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF NEW YORK**

In re:

HUI QIN,  
*aka* MUK LAM LI,  
*aka* KARL QIN,

Debtor.

Case No. 24-41955 (ESS)

Chapter 7

**NOTICE OF MOTION TO ADMIT COUNSEL *PRO HAC VICE***

**PLEASE TAKE NOTICE** that, upon the annexed declaration of movant Hugh M. Ray, III in support of this motion, applicant will move this Court before the Honorable Elizabeth S. Stong at the United States Bankruptcy Court, located at 271-C Cadman Plaza East, Brooklyn, New York 11201-1800, pursuant to Rule 2090-1(b) of the Local Rules of the United States Bankruptcy Court for the Eastern District of New York, District Court Local Rule 1.3(c), and District Court Administrative Order 97-13, for an Order allowing the admission of movant, a member of the firm of Pillsbury Winthrop Shaw Pittman LLP and a member in good standing of the Bars of the States of Texas and New Mexico, as attorney *pro hac vice* to appear and argue in this case and any related adversary proceeding as counsel for Huzhou Chuangtai Rongyuan Investment Management Partnership, Huzhou Huihengying Equity Investment Partnership, and Huzhou Huirongsheng Equity Investment Partnership.

*[Remainder of page intentionally left blank.]*

DATED: June 26, 2024  
New York, New York

/s/ Andrew V. Alfano

Andrew V. Alfano  
Pillsbury Winthrop Shaw Pittman LLP  
31 West 52nd Street  
New York, NY 10019  
Tel: (212) 858-1000  
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Hugh M. Ray, III (*pro hac vice* pending)  
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Houston, TX 77002  
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**DECLARATION IN SUPPORT OF  
MOTION TO ADMIT COUNSEL *PRO HAC VICE***

I, Hugh M. Ray, III, an attorney duly admitted to practice law in the States of Texas and New Mexico, hereby affirm as follows under penalty of perjury:

1. I am a partner with the law firm of:

Pillsbury Winthrop Shaw Pittman LLP  
609 Main Street, Suite 2000  
Houston, TX 77002  
(713) 276-7600

2. I submit this declaration under 28 U.S.C. §1746 in support of my motion for admission to practice *pro hac vice* in the above-captioned case and any related adversary proceeding.

3. As shown in the Certificates of Good Standing annexed hereto, I am a member in good standing in the Bars of the States of Texas and New Mexico. I am also admitted to practice and in good standing in the United States District Courts for the Northern, Southern, Eastern and Western Districts of Texas; the District of Colorado; the District of New Mexico; the United States Supreme Court; the United States Courts of Appeal for the 3rd, 5th, 10th, and 11th Circuits and the United States Tax Court.

4. There are no pending disciplinary proceedings against me in any State or Federal Court.

5. I have not been convicted of a felony.

6. I have not been censured, suspended, disbarred or denied admission or readmission by any court.

7. Wherefore your affirmant respectfully submits that he be permitted to appear as counsel and advocate for Huzhou Chuangtai Rongyuan Investment Management Partnership, Huzhou Huihengying Equity Investment Partnership, and Huzhou Huirongsheng Equity Investment Partnership, *pro hac vice* in this chapter 7 case and any related adversary proceeding.

I certify that the foregoing is true and correct under penalty of perjury.

DATED: June 26, 2024  
Houston, Texas

/s/ Hugh M. Ray, III  
Hugh M. Ray, III

# STATE BAR OF TEXAS



*Office of the Chief Disciplinary Counsel*

June 05, 2024

Re: Mr. Hugh Massey Ray III, State Bar Number 24004246

To Whom It May Concern:

This is to certify that Mr. Hugh Massey Ray III was licensed to practice law in Texas on March 12, 1998, and is an active member in good standing with the State Bar of Texas. "Good standing" means that the attorney is current on payment of Bar dues; has met Minimum Continuing Legal Education requirements; and is not presently under either administrative or disciplinary suspension from the practice of law.

This certification expires 30 days from the date, unless sooner revoked or rendered invalid by operation of rule or law.

Sincerely,

Seana Willing  
Chief Disciplinary Counsel  
SW/web



# Certificate

By: Jessica Gilmore  
Deputy Clerk

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**ORDER FOR ADMISSION TO PRACTICE *PRO HAC VICE***

The motion for admission to practice *pro hac vice* in the above-captioned case is granted. The admitted attorney, Hugh M. Ray, III, is permitted to appear and argue in this bankruptcy case and any related adversary proceedings. The admitted attorney may enter appearances for parties, sign stipulations, receive payments upon judgments, decrees or orders, and otherwise serve as counsel in this case.

The Clerk is directed to enter the above attorney's appearance as counsel in the above-captioned case. The above-named attorney must serve a copy of this Order on Debtor's counsel (if any), the case trustee (if any), and all parties who filed notices of appearance, and file a certificate of such service within 10 business days of the date hereof.